Intercontinental Terminals Company (ITC) Fire Update
Deer Park, Texas
May 2, 2019 0000 – May 2, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

As a result of the fire, nine of the fifteen oil tanks had been burned and collapsed. One of the tanks had been burned and damaged, but not completely collapsed. Two tanks had become overheated and smoked but were not significantly damaged. Four of the tanks had smoked but did not burn.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 parts per million (ppm) were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

A vessel decontamination plan was approved on March 27, 2019. The plan established procedures for decontamination of large and small vessels. Also, the plan describes how the decontamination team will utilize resources that include barge boats equipped with a hot water pressure washer, support boats for assessment team members, containment boom and absorbent sweep, rags, absorbent pads, cleaning agents, personal protective equipment (PPE), boat operators, and technicians.

On March 31, 2019, EPA and the Texas Commission on Environmental Quality (TCEQ) posted the Story Map Resource Interactive tool for the ITC incident. The Story Map provides easy access for ITC fire data.

Executive Overview:

- ITC began their second discharge on May 2, 2019, at a flow rate of 70 gallons per minute. ITC continues to sample the effluent and send the samples for analysis as required in the April 17, 2019 Authorization to Discharge. Results from the initial discharge are being reviewed and shared.
- ITC and their contractors met with the Battleship Texas staff on May 2, 2019. All public areas have been screened and cleared. Park staff have reported back to work at the battleship. A 24-hour air sampling effort will occur starting on May 3, 2019; this is being done to assure staff that the area is safe for overnight stays. Additional monitoring within the confined space tanks is being planned but will not affect the opening of the Battleship Texas.
- ITC sent a memo on the afternoon of April 22, 2019, discussing the mechanical disassembly of tanks 80-14, 80-15, 80-13, 80-10 and 80-7, in that order. These are the tanks with remaining sludge/product that may have releases of benzene. The estimated timeframe for disassembly is 5 days per tank. The plan is being finalized and will be presented to Unified Command. Due to delays, including decommissioning of some product piping in the work area and shoring up the containment wall that collapsed, deconstruction is planned to start May 7, 2019, at the earliest.
- On April 30, 2019, ITC started sampling a representative number of the totes of foam used for fire and vapor suppression. The first samples were sent off for analysis on May 1, 2019 with a 10-day turnaround. Sampling should conclude this weekend.

Land Operations:

- Until demolition of the tanks begin, there are no changes to tank status.

Tank Status	Tank No.
Complete & Clean – No further action (NFA) needed	80-1, 80-4, 80-9, 80-11, 80-12, 80-13

Complete – NFA possible until demo	80-2, 80-3, 80-5, 80-6, 80-7, 80-8, 80-10, 80,14, 80-15
Cleaning and Degassing	

Water Operations:

- EPA conducted surface water sampling on May 02, 2019 at 10 sample locations. The surface water samples were collected in Tucker Bayou and along Buffalo Bayou and the San Jacinto River and will be analyzed for per- and polyfluoroakyl substances (PFAS), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), chemical oxygen demand (COD), and oil & grease. The results from the sampling event will be compared to the TCEQ Surface Water Quality Standards (WQS), or to TCEQ Texas Risk Reduction Program surface water protective concentration levels (PCLs), if a WQS is not available for a chemical. No exceedances have been observed since April 2, 2019.
- The table shows the proportion of shoreline in each division that meets end points or requires no further treatment according to SCAT. SCAT teams did not complete their mission on May 1, 2019 and will re-deploy on May 3, 2019. Ares not meeting endpoints include Santa Anna Bayou and areas near Bostco.

Division	Total Shoreline Length (mi)	Total Length of Shoreline Meeting SCAT End Points or Assigned NFT*	Total Length of Shoreline with UC Sign-off (mi)
A	10.25	10.07	6.09
B	7.82	5.39	1.62
C	27.84	26.53	26.39
D	17.82	15.72	14.28
South & East of D	23.22	23.22	23.22
Total	**86.95**	**80.93**	**71.6**

- As of May 2, 2019:
  - 2,175 feet of boom deployed
  - 278,756 bbl of contaminated water in response tanks
  - 223,882 bbl of organics in response tanks

Total Vessels as of May 2, 2019				
Work Boats	Barges	Small Capacity Skimming Vessels	Skimmers	Total Vessels
7	9	6	6	**28**

Community Air Monitoring:

- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.

- EPA conducted handheld air monitoring on May 02, 2019 from 00:00 to 23:59 at 61 locations in the surrounding communities. Results were reported above the detection limit at one location for total volatile organic compounds (VOCs). EPA will continue to conduct additional air monitoring, and the Trace Atmospheric Gas Analyzer (TAGA) will continue sampling in surrounding communities.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on May 02, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCV for toluene or xylene. The TAGA air sampling results found exceedances of the short-term AMCVs for benzene (0.18 ppm) at approximately three miles north of the ITC facility in Channelview, Texas (north of Carpenter's Bayou and west of the Old River). This information has been shared with unified command and local officials.

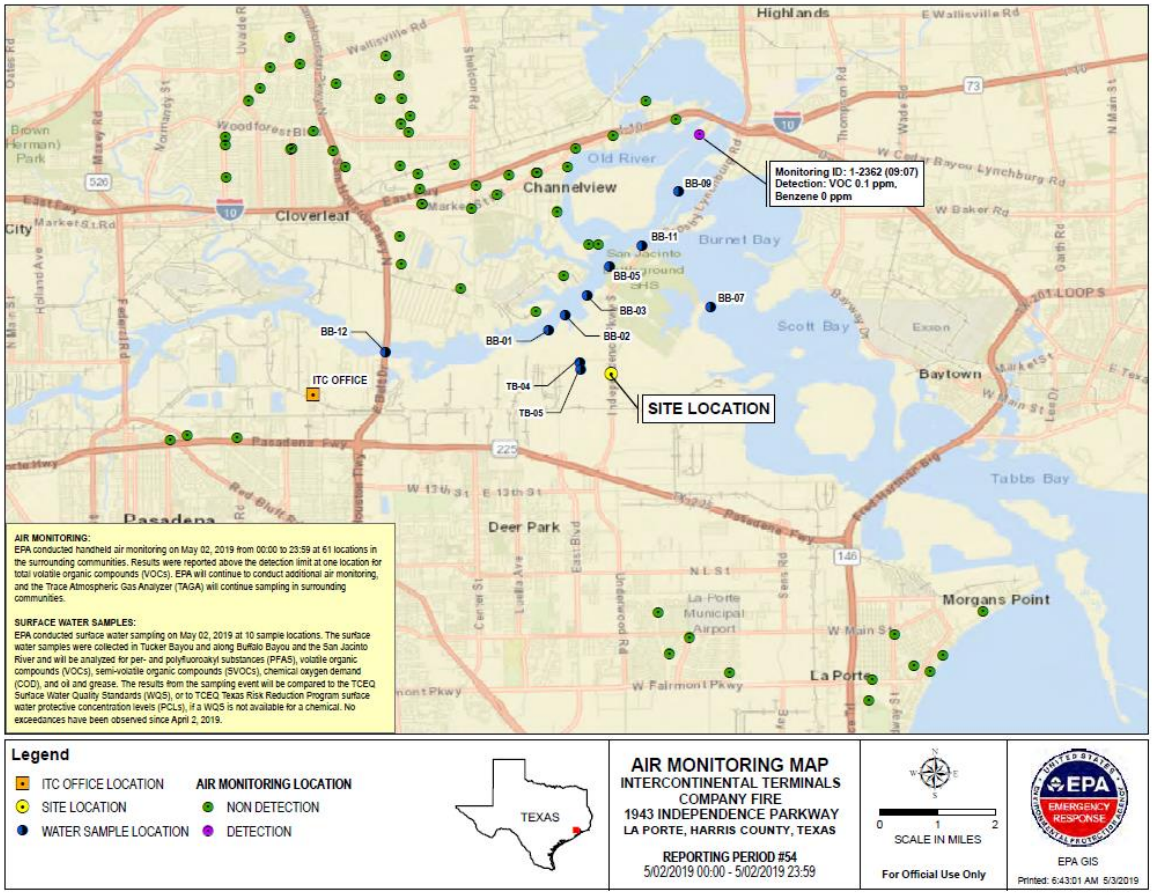
Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	5	2	**7**
EPA Non-Region 6	0	1	**1**
START	1	10	**11**
Other Contractors	0	3	**3**
Total	**6**	**16**	**22**

Additional Information: Air Monitoring and Water Sampling locations:



Substance	CAS #	Short-term AMCV Health (ppb)
benzene	71-43-2	180
m/p-xylene	179601-23-1	1700
o-xylene	95-47-6	1700
toluene	108-88-3	4000